

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JASMIN HERNANDEZ,
Plaintiff,

v.

BAYLOR UNIVERSITY BOARD OF
REGENTS; ART BRILES, in his official
capacity as head football coach; IAN
McCAW, in his official capacity as
athletic director,
Defendants.

§
§
§
§
§
§
§
§
§
§
§

Civil Action No. 6:16-CV-00069-RP-JCM

DEFENDANT BAYLOR UNIVERSITY BOARD OF REGENTS'
UNOPPOSED MOTION TO EXTEND THE TIME FOR FILING AN ANSWER

TO THE JUDGE OF THE HONORABLE COURT:

Defendant moves for an extension of time as follows:

1. This is a civil rights lawsuit filed by a former Baylor University student who was sexually assaulted in 2012 by another student. The Defendants are the University's former head football coach, former athletic director, and the University's Board of Regents, a non-jural entity that is the governing body of the University. Plaintiff has asserted a state law negligence claim and a sexual harassment claim under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681.

2. The deadline for filing an answer or responsive motion is Monday, June 20, 2016. Defendant requests that the Court extend the response date for all defendants through July 20, 2016. Plaintiff does not oppose this request.

3. The primary reason for this request is to provide the parties with an opportunity to explore early resolution of this matter while minimizing the cost and burden of litigation.

Defendant believes that the interests of justice will be served by extending the response date by 30 days.

For the foregoing reasons, the Defendant prays that the Court will grant this motion and extend the time for all defendants to file an answer or responsive motion.

Respectfully submitted,

THOMPSON & HORTON LLP

By: /s/ Lisa A. Brown
Lisa A. Brown
Texas Bar No. 03151470
Phoenix Tower, Suite 2000
3200 Southwest Freeway
Houston, Texas 77027-7554
(713) 554-6741 (telephone)
(713) 583-7934 (fax)
lbrown@thompsonhorton.com (email)

**COUNSEL FOR DEFENDANT BAYLOR
UNIVERSITY BOARD OF REGENTS**

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with Plaintiff's counsel, Alexander Zalkin, and he stated that he does not oppose this motion.

/s/ Lisa A. Brown
Lisa A. Brown

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon opposing counsel on June 9, 2016, via the Court's ECF/CMF electronic filing and service system as follows:

Mr. Alexander Zalkin
12444 High Bluff Drive, Suite 301
San Diego, California 92130
alex@zalkin.com

Ms. Susan Hutchison
509 Pecan Street, Suite 201
Fort Worth, Texas 76102
hutch@hsjustice.com

/s/ Lisa A. Brown
Lisa A. Brown

798563
094030.000002